

Remarks

This Application has been carefully reviewed in light of the Office Action. Claims 1-3, 5-7, 9-15, 19-24, and 28-37 are pending in the Application. The Office Action rejects Claims 1-3, 5-7, 9-15, 19-24, and 28-37. Applicants have amended Claims 1, 14, 34, and 35. Applicants respectfully request reconsideration and favorable action in this case.

Rejections under U.S.C. § 112

The Office Action rejects Claims 1, 14, 34, and 35 under 35 U.S.C. § 112, first paragraph. The Office Action contends that Claims 1, 14, 34, and 35 fail to comply with the written description requirement. Applicants respectfully traverse this contention. However, in order to advance prosecution, Applicants have amended Claims 1, 14, 34, and 35. Accordingly, Claims 1, 14, 34, and 35 are allowable. Reconsideration and favorable action is requested.

Rejections under U.S.C. § 103

The Office Action rejects Claims 1-3, 5-7, 9, 12-15, 34, and 35 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent 6,370,373 to Gerth et al. ("*Gerth*") in view of U.S. Patent Application Pub. No. 2005/0059396 to Chuah et al. ("*Chuah*"), and further in view of U.S. Patent 6,466,777 to Urita ("*Urita*"). The Office Action rejects Claims 10, 11, 19-22, 24, 28-33, 36, and 37 under 35 U.S.C. § 103(a) as being unpatentable over *Gerth* in view of *Chuah*, in view of *Urita* as applied to Claim 1, and further in view of U.S. Patent 6,904,278 to Iyer ("*Iyer*"). The Office Action rejects Claim 23 under 35 U.S.C. § 103(a) as being unpatentable over *Gerth* in view of *Chuah*, in view of *Iyer* as applied to Claim 19, and further in view of U.S. Patent Application Pub. No. 2003/0185244 to Wu et al. ("*Wu*"). Applicants respectfully traverse these rejections.

Independent Claim 1, as amended, is allowable at least because *Gerth* fails to disclose, expressly or inherently, "a conflict resolution engine for resolving conflicting access point associations, the conflicting access point associations being two or more associations of the same mobile unit with respective two or more access points." The Office Action alleges that a previous version of this limitation is met by a system of *Urita* whereby "a mobile terminal (Fig. 1, 102) and a cloned terminal (Fig. 1, 103) having the same telephone number

registers with its base stations (Fig. 1, 101 and 111) and the comparator and detector within the HLR (Fig. 1, 105) detects the cloned mobile terminal based on the position information.” *See* Office Action, Page 5. Whether or not this is correct, *Urita* does not disclose “two or more associations of the same mobile unit with respective two or more access points.” For example, a mobile terminal and a cloned terminal are two different terminals. Consequently, *Urita* fails to disclose, expressly or inherently, “a conflict resolution engine for resolving conflicting access point associations, the conflicting access point associations being two or more associations of the same mobile unit with respective two or more access points.”

For at least this reason, Independent Claim 1, as amended, is allowable, as are Claims 2-3, 5-7, and 9-13 that depend therefrom. For analogous reasons, Independent Claims 14, 34, and 35, as amended, are allowable, as is Claim 15 that depends therefrom. Reconsideration and favorable action is requested.

Independent Claim 19 is allowable at least because *Iyer* fails to disclose, expressly or inherently, “providing a visualization of current associations between the access points and corresponding associated wireless devices.” The Office Action alleges that this limitation is met by *Iyer*. *See* Office Action, Page 8. However, as stated in the Response to Office Action dated August 7, 2006, and left unrebutted by the present Office Action, this is incorrect. Running a graphical report, referred to as a “Tear Down Report” by *Iyer*, of torn down calls—associations that are no longer current—with whatever frequency is desired, as is disclosed by *Iyer*, does not meet the “providing a visualization of current associations” limitation, as is claimed. *See Iyer*, Col. 16, Lines 23-48, Col. 5, Lines 35-37. Consequently, *Iyer* clearly fails to disclose, expressly or inherently, “providing a visualization of current associations between the access points and corresponding wireless devices.”

For at least this reason, Independent Claim 19 is allowable, as are Claims 20-24 that depend therefrom. For analogous reasons, Independent Claims 28, 36, and 37 are allowable, as are Claims 29-33 that depend therefrom. Reconsideration and favorable action is requested.

CONCLUSION

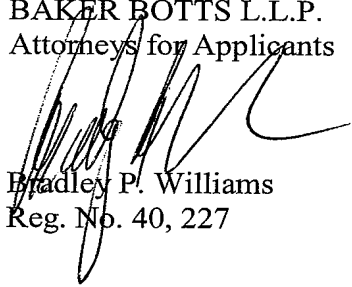
Applicants have now made an earnest attempt to place this case in condition for immediate allowance. For the foregoing reasons and for other apparent reasons, Applicants respectfully request allowance of all pending claims.

If the Examiner feels that prosecution of the present Application may be advanced in any way by a telephone conference, the Examiner is invited to contact the undersigned attorney at 214-953-6447.

Applicants believe no fee is due. However, the Commissioner is hereby authorized to charge any additional fee or credit any overpayment to Deposit Account No. 02-0384 of BAKER BOTTS L.L.P.

Respectfully submitted,

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Date: February 14, 2007

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